

Exhibit 3-1  
CDBG Entitlement Program

6509.2 REV-5

<b>Guide for Review of Eligibility</b>			
<b>Name of Program Participant:</b>			
<b>Staff Consulted:</b>			
<b>Name(s) of Reviewer(s):</b>		<b>Date:</b>	

**NOTE:** All questions that address requirements contain the citation for the source of the requirement (statute, regulation, NOFA, or grant agreement). If the requirement is not met, HUD must make a finding of noncompliance. All other questions (questions that do not contain the citation for the requirement) do not address requirements, but are included to assist the reviewer in understanding the participant's program more fully and/or to identify issues that, if not properly addressed, could result in deficient performance. Negative conclusions to these questions may result in a "concern" being raised, but not a "**finding**." [24 CFR 570.900(b)(3)]

**Instructions:** Use this Exhibit to monitor a program participant's documentation that each CDBG-assisted activity is eligible under section 105 of the Housing and Community Development Act of 1974, as amended, as implemented at 24 CFR 570.200(a) and 570.201 through 570.206. This Exhibit is NOT to be used for monitoring rehabilitation or economic development activities. For either of these activities, the HUD reviewer should use Exhibits 3-10, 3-11, or 3-12, as applicable.

**Questions**

**A. ELIGIBILITY DETERMINATION PROCESS**

1.

a. Does the program participant have a process or procedure to determine the eligibility of CDBG assisted activities?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>		
b. If yes, is the process in writing and available to the appropriate staff members?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<input type="checkbox"/> N/A		
<b>Describe Basis for Conclusion:</b>		

Exhibit 3-1  
CDBG Entitlement Program

c. If there is a written process, is it communicated to entities and individuals seeking CDBG funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
<b>Describe Basis for Conclusion:</b>			

2.

Is there a procedure or process that the program participant follows to check information provided by an entity or individual seeking CDBG funding assistance in order to assess activity eligibility?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
<b>Describe Basis for Conclusion:</b>		

3.

Describe how the program participant documents its eligibility determinations for CDBG-assisted activities. [24 CFR 570.506(a)]
<b>Describe Basis for Conclusion:</b>

4.

Is there a process or procedure by which higher-level management reviews eligibility determinations?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
<b>Describe Basis for Conclusion:</b>		

5.

Is there evidence that ineligible activities are assisted?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
<b>Describe Basis for Conclusion:</b>		

B. ACTIVITY-SPECIFIC ANALYSIS

6.

List CDBG-assisted activities selected for review by name or number, as applicable.
<b>List activities:</b>

7.

a. Did the program participant properly classify the eligibility of each the activities listed in question 1 above? [24 CFR 570.201-206]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
<b>Describe Basis for Conclusion:</b>		

  

b. If “no”, list any activity(ies) incorrectly classified, how they were classified, and provide the correct eligibility classification.
<b>Describe Basis for Conclusion:</b>

Exhibit 3-1  
CDBG Entitlement Program

8.

a. Were any of the CDBG-assisted activities reviewed in question 1 above determined to be ineligible under the provisions of 24 CFR 570.207?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>   		

b. If “yes,” which provision of 24 CFR 570.207 was violated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
<b>Describe Basis for Conclusion:</b>   			

C. CONCLUSION

9.

Based upon the above analysis, does the program participant’s process or procedure(s) for eligibility determinations result in eligible activities being funded and properly classified?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Describe Basis for Conclusion:</b>   		